
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA,
WESTERN DIVISION**

KELLY STAFFORD et al.,	:	
	:	
Plaintiffs	:	
	:	Civil Action No. 5:20-cv-000123-FL
v.	:	
	:	
GERALD M. BAKER,	:	
	:	
Defendant	:	

**STIPLUATION EXTENDING TIME FOR PLAINTIFFS'
RESPONSE TO DEFENDANT'S MOTION TO DISMISS**

All parties stipulate that good cause exists for an order extending Plaintiffs' time to respond to Defendant's motion to dismiss the Complaint by 30 days based on the reasons set forth below, and respectfully request the Court enter such an order.

Plaintiffs instituted this civil action on March 27, 2020, and Defendants were served on April 2, 2020. Defendants filed a motion to dismiss the complaint on April 28, 2020, rendering Plaintiffs' opposition due May 19, 2020, in the normal course.

Since the filing of Defendant's motion, one of Plaintiffs' counsel has experienced a death in his family, which resulted in unanticipated time and travel away from his office. Further, the parties have since conferred about the general status and posture of the case. They intend to continue their discussions for purposes of exploring the possibility of informally resolving of one or more of the claims, potentially reducing further consumption of the parties' and the court's time and

resources in connection with the pending motion to dismiss. The stipulated extension is necessary to accommodate this process and to permit the timely filing of Plaintiffs' opposition to Defendant's motion to dismiss the Complaint should that be necessary.

The parties respectfully request that the Court so order.

Dated this 14th day of May, 2020.

Respectfully Submitted,

/s/ Edward H. Green, III
Edward H. Green, III

/s/ Paul G. Gessner
Paul G. Gessner

/s/ Raymond M. DiGuiseppe
Raymond M. DiGuiseppe

Attorney for Defendant

/s/ Adam Kraut
Adam Kraut

Attorneys for Plaintiffs

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GERALD M. BAKER,	:	
	:	
Defendant	:	

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2020, I electronically filed the foregoing Stipulation with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties required to be served with the same: Paul G. Gessner (Defendant's counsel); and Edward H. Green, III, Adam Kraut, and Raymond M. DiGuiseppe (Plaintiffs' counsel).

Respectfully Submitted,

/s/ Raymond M. DiGuiseppe
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